



INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY

Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226

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PROCEDURE FOR OBTAINING LABEL APPROVALS FOR IMPORTED LIQUEURS, CORDIALS, FLAVORED SPIRITS AND DISTILLED GINS

Importers and others concerned

Purpose. This circular announces the future publication of an ATF Procedure which will be published in the next Alcohol, Tobacco and Firearms Quarterly Bulletin. The procedure will read substantially as follows:

Section 1. PURPOSE

This procedure provides guidelines for obtaining Federal label approval for imported liqueurs, cordials, flavored spirits and distilled gins.

Section 2. BACKGROUND

Liqueurs, Cordials and Flavored Spirits

The Bureau has consistently held that importers of all imported liqueurs, cordials and flavored spirits must obtain a statement from the foreign producer listing all ingredients and must submit a minimum 750 ml sample for analysis prior to issuing certificates of label approval.

Section 5.33(g) of Title 27, Code of Federal Regulations reads as follows:

(g) Contents of bottles. A complete and accurate statement of the contents of the bottles to which labels are to be or have been affixed shall be submitted, on request, to the Director or the regional director (compliance).

Distilled Gins

Section 5.22(c), Class 3, defines "gin" as a product obtained by original and continuous distillation from mash, or by redistillation of distilled spirits, or by mixing neutral spirits, with or over juniper berries and other aromatics, or with or over extracts derived from infusions, percolations, or maceration of such materials, and includes mixtures of gin and neutral spirits. It shall derive its main characteristic flavor from juniper berries and be bottled at not less than 80 proof. Gin produced exclusively by the original distillation or by redistillation may be further designated as "distilled".

In order to properly determine the class of an imported gin, the Bureau has always required that a statement of process be submitted prior to issuing label approvals for gins designated as "distilled" in accordance with 27 CFR 5.51(d). Section 5.51(d) reads as follows:

(d) Statements of Process. Forms 1649 covering labels for gin bearing the word "distilled" as a part of the designation shall be accompanied by a statement prepared by the manufacturer, setting forth a step-by-step description of the manufacturing process.

The Bureau has determined that several reasonable alternatives exist as to obtaining certificates of label approval for imported liqueurs, cordials and gins.

Section 3. ACCEPTABLE PROCEDURES

Prior to issuing certificates of label approval, the Bureau will require one of the following pieces of documentation:

Liqueurs, Cordials and Flavored Spirits

1. A statement of ingredients from the manufacturer and a 750 ml sample; or
2. A statement from the manufacturer that the product to be imported is identically formulated for world-wide distribution, provided ATF has a list of the ingredients on record, and a 750 ml sample; or
3. A 750 ml sample, and a statement from the importer setting forth the specific contents of the product. Such statement must be supported by a laboratory analysis performed by a commercial laboratory as to the specific ingredients contained in the product, and should differentiate between natural and artificial ingredients, colors, flavors, etc.

Distilled Gins

1. A statement of process from the manufacturer specifying the step-by-step process by which the "Distilled Gin" is manufactured; or
2. A statement from the manufacturer that the product to be imported is identically formulated for world-wide distribution, provided ATF has a statement of process on record.

Section 4. LIMITATIONS

The Bureau reserves the right to require resubmission of the appropriate documentation and/or samples in situations where the Bureau has reason to believe the product has been changed, or when required by the Director.

Section 5. INQUIRIES

Inquiries concerning this circular should refer to its number and be addressed to the Associate Director (Compliance Operations), Bureau of Alcohol, Tobacco and Firearms, 1200 Pennsylvania Avenue, N.W., Washington, DC 20226.


Director

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